IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

DANIEL ADAMS, On Behalf of Himself and All Others Similarly Situated,	§	
Plaintiff,	§	
v.	§	CIVIL ACTION NO. 4:15-cv-1923
APACHE CORPORATION and CRESCENT CONSULTING, LLC	§	
Defendants.	§	

MOTION FOR APPROVAL OF SETTLEMENT AGREEMENT AND DISMISSAL WITH PREJUDICE OF PLAINTIFF'S CLAIMS AGAINST DEFENDANT CRESCENT CONSULTING, LLC

Plaintiff Daniel Adams ("Plaintiff") moves this Court to dismiss with prejudice his claims against Defendant Crescent Consulting, LLC ("Defendant" or "Crescent"), and would respectfully show the Court as follows:

1. Plaintiff has reached a confidential agreement with Defendant Crescent to resolve all of his claims against Defendant Crescent. Plaintiff and Defendant Crescent, through their counsel, are available for a telephone conference at the Court's request to discuss the terms of such agreement if the Court so chooses.

2. Plaintiff seeks entry of an order, based on such agreement described in paragraph 1 above, dismissing his claims with prejudice as to Defendant Crescent.

3. Counsel for Defendant Crescent confirmed its lack of opposition to this motion in conversations and communications with the undersigned counsel.

WHEREFORE, Plaintiff moves for entry of an Order Approving Settlement Agreement and Dismissing with Prejudice Plaintiff's Claims Against Defendant Crescent Consulting LLC, a form for which is attached hereto.

Respectfully submitted,

By: s/ Allen R. Vaught
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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF CONFERENCE

I hereby certify that on May 20, 2016, the undersigned conferred with Counsel for Defendant Crescent, and Defendant Crescent is Unopposed to this Motion.

s/ Allen R. Vaught
Allen R. Vaught

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served upon counsel of record by the Southern District of Texas CM/ECF method on May 26, 2016.

s/ Allen Vaught
Allen R. Vaught